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File: 9-C-1-5-1  
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**KELLY AFB  
TEXAS**

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## **ADMINISTRATIVE RECORD COVER SHEET**

AR File Number 796

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Barry R. McBee, *Chairman*  
R. B. "Ralph" Marquez, *Commissioner*  
John M. Baker, *Commissioner*  
Dan Pearson, *Executive Director*



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File: AR# 796  
S.T. KAR# 778

## TEXAS NATURAL RESOURCE CONSERVATION COMMISSION 796 2

*Protecting Texas by Reducing and Preventing Pollution*

September 23, 1997

Mr. William Ryan  
Chief, Restoration Operations Branch  
SA-ALC/EMRO  
305 Tinker Drive  
Building 305, Suite 2  
Kelly AFB, Texas 78241-5915

**CERTIFIED MAIL**  
**RETURN RECEIPT REQUESTED**

Re: Kelly Air Force Base (Kelly AFB), San Antonio, Texas  
Solid Waste Registration No. 31750; EPA ID No. TX2571724333  
Review of IRP Site SS009 Closure Report, Draft Final (Revised), dated July 1997  
**Closure Approved with Modifications**

Dear Mr. Ryan:

The Texas Natural Resource Conservation Commission Federal Facilities Team staff (TNRCC) has completed review of the above-referenced document (Report), received from Kelly AFB on July 29, 1997. The Report was submitted to meet the requirements of TNRCC Risk Reduction Standard (RRS) No. 2, as promulgated in Title 30 of Texas Administrative Code (30 TAC) Sections 335.551-569, for closure of Installation Restoration Program (IRP) Site SS009 and surrounding property affected by operations at the IRP site. Kelly AFB has defined IRP Site SS009 (hereafter referred to as "Site SS009") as an approximately 1.2 acre rectangular tract measuring approximately 200 by 250 feet. The area affected by operations at Site SS009 has been surveyed for county deed recordation purposes (Report Appendix O) as a 33.01 acre tract surrounding Site SS009. This larger tract coincides with the areas occupied by storage yard No. 68 and the "Dock Staging Area," and is referred to in Report Figure 1.1 as "Southwest Corner of East Kelly." This 33.01-acre tract is hereafter referred to as "the Site."

The TNRCC herein approves closure of the Site under RRS No. 2 with modifications to the Report as detailed below. Please be advised that should additional information and/or interpretation of existing data become available which indicates the Site is not suitable for closure, the TNRCC will require Kelly AFB to conduct further investigation and/or remediation of the contamination.

The following modifications to the Report resulted from the TNRCC's review of the Report and other applicable documents, and its meeting on August 19, 1997 with personnel from Kelly AFB,

CH2M Hill, and the US EPA Region VI Office.

- 1) The Executive Summary and other applicable sections should be amended to state that, in accordance with 30 TAC §335.560(b), Kelly AFB shall submit to the TNRCC proof of deed recordation within 90 days of the date of this letter.
- 2) In the legend in Figure 1.2, page 1-6, the dashed line should be identified as "Southwest Corner of East Kelly," rather than as "SS009." Also, storage yards No. 68 and the "Dock Staging Area" should be identified on the figure and discussed in Section 1.4.1. The Dock Staging Area is defined by Kelly personnel as the area north of storage yard 68 and south of Lawrence Street.
- 3) Section 1.4 should clearly state the size of Site SS009 and what the site boundary represents (ie., extent of storage, extent of release, etc.); also, evidence for the extent should be cited (ie., aerial photos, site photos, interviews with base personnel). The boundary of Site SS009 should be added to Figures 3.1, 4.1 and 6.1, and modified, if needed, on Figures 1.2 and 2.2.
- 4) The term "the site" should be defined early in the Report and used in a manner consistent with the definition. The TNRCC suggests using the definition given in the first paragraph of this letter.
- 5) On page 1-14, Table 1.1, Category 20 should be revised to state that the Findings of Suitability to Lease or Transfer the Site must include restrictions in accordance with a non-residential land use.
- 6) On page 1-15, Table 1.1, Category 22 indicates that the surface drains located at the Site were not considered with respect to impacts to surface water. This exposure pathway needs to be evaluated and the Report amended accordingly.
- 7) The second bullet on page 3-6 should clarify that the objective here applies only to determining if contaminants are present in the soil samples from monitoring well MW 134. The two paragraphs after the bullets should be changed to clearly link results with samples of groundwater, soil from the well boring, or soil from the hand augered borings. Also, the text should clearly state results for all the parameters tested.
- 8) On page 4-1, a fourth bullet should be added to specify that the SPLP samples were collected from surface soil only.
- 9) Table 5.1 should state the dates the samples were collected (month/year) and the categories of locations from which they were collected (ie., hand augered borings, well boring, etc.). Also, results for lead are missing from the second half of the table.

- 10) The shaded header for Table 5.2 should specify the SPLP results are for surface soil samples.
- 11) The series of maps beginning with Figure 5.2 (which show concentrations in soil for various contaminants) should include a map for the lead distribution in surface and subsurface soil.
- 12) In Section 5.2.1.1, page 5-7, the second paragraph should reference the TNRCC's September 13, 1996 letter; a copy of the letter should be included in Appendix K.
- 13) In Table 5.4, the depths from which the samples were collected should be indicated for all locations, not just for HA06 and MW134.
- 14) In Table 5.8, the SAI-Ind for lead should be given as 1.00E+03, rather than "not calculated".
- 15) In Table 5.8, the RME (Reasonable Maximum Exposure Concentration) for arsenic should be based only on samples collected from the obvious release area, as per the TNRCC's February 27, 1997 letter, a final copy of which should be included in Appendix K. The "RME Exceeds SAI-Ind" column for arsenic should read "yes." Also, the first paragraph of Section 5.2.2.2, Section 5.4, the Executive Summary, and any other applicable areas of the Report should be changed to reflect the fact that the arsenic RME for the obvious release area exceeded both the RRS No.2 GWP-Ind and SAI-Ind values, resulting in the need for corrective action to attain closure under RRS No.2. Finally, Figure 5.20 or 6.1 should be modified to show the area within which soil arsenic results were used to calculate the RME (ie., the area designated as the obvious release area); the arsenic results also should be shown on the figure.
- 16) Sections 5.3.1 and 5.3.2 should include summaries of the SPLP results for each contaminant.
- 17) Section 6.3 states that post-excavation arsenic concentrations in the release area meet a RRS No.2 value of 20 ppm (the SAI-Ind), but fails to mention whether RRS No.2 is met with respect to the GWP-Ind value of 8.5 ppm. Both the SAI-Ind and GWP-Ind must be considered since both criteria were exceeded by the pre-excavation concentrations.
- 18) Page 7-1, second paragraph, states that "Although only a 1.2-acre area required remediation to meet the RRS No.2 criterion of 20 mg/kg arsenic, Kelly AFB is voluntarily deed-recording a 33-acre parcel which includes Site SS009 and the remediation area." This sentence is confusing because it seems to imply that, in general, deed recordation is performed only for remediated areas. Please note that deed recordation is required for areas exhibiting contaminant concentrations exceeding RRS No.1. The sentence should be changed to indicate that: 1) the area exceeding RRS No.1 for the contaminants associated with Site SS009 was defined by the investigations and covers an area of approximately 20 (?) acres, and 2) however, a larger tract coinciding with the area covered by

Mr. William Ryan  
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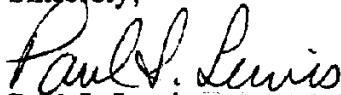
storage yard No. 68 and the Dock Staging Area (and shown in Report Figures 1.1 and 1.2 as "Southwest Corner of East Kelly") was deed recorded for convenience and to provide an additional level of protection to human health and the environment.

19) In Appendix O (Deed Recordation), Section 1 of the Industrial Solid Waste Certification of Remediation, and Table 1 (showing maximum contaminant concentrations remaining at the Site) should be changed to indicate that: 1) the dioxins/furans and arsenic are the only contaminants listed in the table which are demonstrably associated with the herbicide storage that occurred at Site SS009, 2) therefore, although the non-associated contaminants are listed in Table 1, they are not included under the closure of Site SS009, 3) these non-associated contaminants are listed in Table 1 only as public notification of their presence, and 4) the investigations conducted at Site SS009 demonstrate that these non-associated contaminants are present at concentrations meeting RRS No. 2. Similar statements should be included in the body of the Report wherever applicable, particularly in the Executive Summary. In addition, the body of the Report should clarify that the source(s) and extent of the non-associated contaminants have not been determined, and that Kelly AFB will conduct further investigation of these contaminants under the ongoing Zone 4 Remedial Investigation.

Pursuant to item 19 above, Kelly AFB shall submit within 90 days of receipt of this letter a work plan to investigate the contaminants identified--but not fully delineated--by the Site SS009 investigations. Kelly AFB is encouraged to work closely with the TNRCC and EPA in preparation of the required plan.

Should you have any questions regarding this matter please contact Mr. Gordon Banner of the Federal Facilities Team at 512/239-5914, Mail Code MC-127.

Sincerely,



Paul S. Lewis

Manager, Corrective Action Section  
Industrial and Hazardous Waste (I&HW) Division

PSL:gb

cc: Ms. Camille Hueni, EPA Region VI, Dallas  
Mr. Thomas Edwards, Texas Attorney General's Office, Austin  
Mr. Arun Bokkasada, TNRCC Region 13 Office, San Antonio  
Mr. Parker Wilson, TNRCC Legal Division, Hazardous Waste/Superfund Section  
Ms. Tennie Larson, TNRCC I&HW Division, Corrective Action Section (ICL380)

**FINAL PAGE**

**ADMINISTRATIVE RECORD**

**FINAL PAGE**